

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATE OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 12 CR 842
)	
STEVEN MANDELL)	Judge Amy St. Eve
)	
Defendant.)	
)	

**MOTION FOR LEAVE TO FILE EX PARTE AND UNDER SEAL A PORTION
OF DEFENDANT'S REPLY TO THE GOVERNMENT'S RESPONSE TO DEFENDANT
STEVEN MANDELL'S MOTION FOR IMMEDIATE DISCLOSURE OF FAVORABLE
EVIDENCE**

Steven Mandell, defendant, through his attorneys, Keith Spielfogel and Robert Loeb, requests that he be permitted to file a reply to the government's relevancy objection on page 43 of the Government's Amended Response under section 1. The argument on relevancy would reveal possible trial strategy that the government is not entitled to disclosure of at this point of the proceedings.

Respectfully submitted,
s/Keith Spielfogel
s/ Robert Loeb
Attorneys for Defendant

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CERTIFICATE OR SERVICE

I hereby certify that on the 14th day of October, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all parties pursuant to the district court's system as to ECF filers.

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